REMARKS

This is in response to the Office Actions dated March 2, 2005 and October 19, 2004. Claims 8-18, 25-40, 46 and 48-52 are pending.

Claim 8 stands rejected as being allegedly anticipated by Ohtani. This Section 102 rejection is respectfully traversed for at least the following reasons. Claim 8 requires that the thickness (d) of the supplementary capacitance insulating film be: **$d = \{\lambda/(2 \times n)\} \times m$**. Ohtani fails to disclose or suggest this.

Ohtani in Fig. 1 discloses an LCD including ITO pixel electrode 108, ITO auxiliary capacitance electrode 104, and capacitance insulator 105. Ohtani at col. 4, line 67 teaches that the thickness (d) of the capacitance insulator 105 should be defined by the following equation: $d = \lambda/(4 \times n)$.

In contrast with Ohtani, claim 8 requires that the thickness (d) of the supplementary capacitance insulating film be: **$d = \{\lambda/(2 \times n)\} \times m$**. Ohtani fails to disclose or suggest this. Ohtani's aforesaid equation [$d = \lambda/(4 \times n)$] is not equal to the equation required by claim 8. For example, consider a scenario where n=2. When n=2, the equation of claim 8 would be: $d = \lambda/4 \times m$. However, given the same exact scenario where n=2, the equation of Ohtani would be: $d = \lambda/8$. It can be seen that the result from Ohtani's equation is much different than the result of the equation required by claim 8. In particular, the equation required by claim 8 permits unexpectedly improved results as explained in the instant specification. Ohtani is entirely unrelated to the invention of claim 8 in this regard.

In paragraph 6, the October 19, 2004 Office Action contends that the equation of Ohtani "can be rewritten as $d = \lambda/(2 \times n) \times m$, wherein m=2" as required by claim 8. This allegation is incorrect (probably because the Examiner has incorrectly placed m in the denominator of the

equation in claim 8). This confusion is also evidenced by the Advisory Action's indication that the equation was "unclear." The Office Action incorrectly attempts to use "m" in the *denominator* of the equation, which clearly is not the case.

Claim 8 has been amended as requested by the Examiner to again expressly state that in the equation "m" is in the *numerator* (e.g., see pg. 17). If "m" is an integer as alleged in the Office Action, it is impossible for Ohtani's equation to be rewritten to meet that of claim 8 because m is in the numerator in the equation of claim 8 (in claim 8, only the parenthetical is in the denominator as will be appreciated by those of ordinary skill in the art). Moreover, the instant specification makes clear on pages 17+ in view of the numbers plugged into the equation and the results, that "m" must be in the numerator. One of ordinary skill in the art would clearly have recognized this, so that the addition of the brackets to the equation in the claim for clarification purposes does not present any new matter. Still further, the equation in the original specification makes clear that "m" must be in the numerator, since if it was otherwise the parenthesis would not have been placed around "2 x n." The fact that the parenthesis were placed around "2 x n" in the original specification and claims makes it very clear that "m" is in the numerator, and not the denominator. Again, given that "m" is in the numerator of the equation, the cited art cannot possibly meet the invention of claim 8.

Claims 15, 33, 46 and 49 define over the cited art in a similar manner.

For at least the foregoing reasons, it is respectfully requested that all rejections be withdrawn. All claims are in condition for allowance. If any minor matter remains to be resolved, the Examiner is invited to telephone the undersigned with regard to the same.

Respectfully submitted,

NIXON & VANDERHYE P.C.

By: _____
Joseph A. Rhoa
Reg. No. 37,515

JAR:caj
1100 North Glebe Road, 8th Floor
Arlington, VA 22201-4714
Telephone: (703) 816-4000
Facsimile: (703) 816-4100